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June 26, 1998

Attention: Lester Snow, Executive Director
CalFed Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Environmental Impacts of an Enlarged Shasta Dam and Lake Expansion

Dear Mr. Snow,

I have been an environmental planner for over 20 years. Much of my work has included writing and reviewing project Environmental Impact Reports and Environmental Impact Statements. I have recently had the opportunity to review the CalFed EIS/EIR relating to the above noted project. Frankly, I am appalled at the inadequacy of the document. Several of the project alternative designs do not pretend to avoid project impacts. Moreover, the project significant adverse environmental impacts identified can not be mitigated to a level of insignificance.

As you know, significant adverse environmental impacts that can not be mitigated require a finding of overriding consideration under CEQA and NEPA law. The overriding considerations must include findings that the project has significant public benefit that outweighs the environmental impacts. Accordingly, CEQA and NEPA laws require factual evidence to support the findings of overriding considerations. Given the facts that have been provided in the project EIS/EIR, it seems patently absurd to think that any one of the 12 surface water storage project alternatives can be approved. Moreover, it appears that the EIS/EIR are inadequate because short shrift has been given to the more efficient alternatives that include efficient water use, conservation, and reclamation of existing water resources.

The project EIS/EIR is inadequate because it does not equally explore viable project alternatives for resource conservation. Moreover, the 12 surface water storage alternatives are in direct conflict with existing state and federal laws including the Clear Water Act, Aquatic Habitat and Endangered Species Protection Act, National Forest Policy and Plans, Wild and Scenic Rivers Protection Act and California and U.S. Environmental Protection Act. Act.

The project EIS/EIR is inadequate because the project surface water storage alternatives do not adequately address the following:

- * loss of sport fisheries and,
- * loss of recreation opportunities due to construction and,
- * loss of hydroelectric power during project development and,
- * loss of timber resources and,
- * loss of biological habitat and species diversity and,
- * loss of significant wild river shoreline and plant and animal habitat on the McCloud River and,
- * loss of terrestrial habitat and species including up to 30,000 acres of winter range in the area for deer and elk and,
- * loss of human habitat and private property.

Additional information is needed for the public to clearly understand how the project alternatives compare. Decision makers need substantial additional information to fairly assess project alternatives and to compare the various options. All of the alternatives should be given equal detailed analysis including the no-project alternative.

The project EIS/EIR is inadequate because it does not analyze the social and economic impacts of the water storage alternatives and compare the same or similar impacts for the conservation alternatives. Please provide more information.

The project EIS/EIR is inadequate because it does not provide a clear comparison of the costs and benefits between the surface storage alternatives and the conservation alternatives. Provide additional information on the conservation alternatives.

The project EIS/EIR is inadequate because it does not inform the public about all of the project alternatives that could serve the public good. The public has a right to more information.

The project EIS/EIR is inadequate because it does not include clear disclosure of all of the mitigation information and facts and supporting evidence necessary to support the required overriding considerations needed to approve a project. Will the findings of overriding consideration be provided and will facts be presented to support the findings ? When will this be disclosed to the public ? When will the decision makers have this information ?

The project EIS/EIR is inadequate because it does not clearly indicate how the loss of significant archaeology resources will be mitigated and what the cost to native peoples will be. How will the loss of these cultural resources be mitigated ? What are the study costs and mitigation costs for the loss ?

The project EIS/EIR is inadequate because it does not provide the public a clear comparison of long term comprehensive plan alternatives to improve water management in the San Francisco Bay/ Sacramento - San Joaquin Delta. There is no comparative analysis to show how one alternative outweighs the long term impacts on the northern California wild rivers and their supporting habitat. When will the comparison be provided to the public ?

Summary

It seems clear under NEPA and CEQA law that the project EIS/EIR is completely inadequate unless it fully discloses to the public the facts that show a comparison between the benefits of improving water management in the San Francisco Bay Delta and the burden of the project on the northern California public and private water and natural resources. The EIS/EIR has not demonstrated that any of the project alternatives provide best management practices for the National Forest Resources. It seems to me that CalFed project alternatives studied in the project EIS/EIR are so limited that they simply trade off improved health of San Francisco Bay Delta waters for massive destruction of private property and public National Forest Resources in the wild and scenic rivers area of the northern state. Perhaps selecting surface water storage alternatives has some merit but it seems logical and consistent with current local, state and federal law to focus on conservation alternatives that are more consistent with current laws.

The project EIS/EIR is inadequate because it does not give indepth analysis of conservation alternatives. The public has a right to know how conservation alternatives compare with surface water storage alternatives not only from a cost perspective but also from a natural and cultural resource protection perspective.

The purpose of the CalFed study is to disclose to the public realistic and feasible (including legal) alternatives to improve water resources management in the Bay Delta. Isn't there also an obligation to fully consider a balance between the protection of Delta water resources and an equal protection of the wild river water and habitat resources. Inundation of several thousand acres of upland areas to improve water management downstream seems to suggest that one has higher value than the other. How has this value been decided ? There is no specific HEP analysis for alternatives. It also suggest that the problem can simply be transferred from one area to another and this seems to be the total antithesis of basic ecological principles and practices.

How can the current studies pretend to be Environmental Impact Statement and Environmental Impact Reports without study of project alternatives that provide a balanced sustainable approach to resource management which protects both Delta and upland wild river resources equally ? Without rivers and streams we have no bay. Of course the health of each resource is very interdependent. The challenge is to find comprehensive sustainable solutions to ecological problems not to create new problems to mitigate existing ones. Significant new thought and substantial additional information is needed to demonstrate feasible alternatives worthy of public consideration.

Thank you for this opportunity to comment. Please provide responses to the above noted questions in writing.

Sincerely,

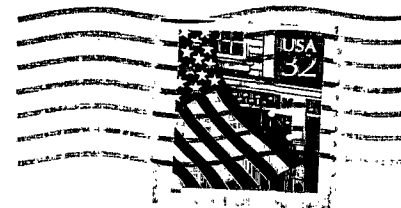
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